

AO 91 (Rev 8/01) Criminal Complaint

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Mariana Iordache

AKA: Mariana Ciuciu

IAE
Romania

(Name and Address of Defendant)

United States District Court
Southern District of Texas
FILED

JAN 16 2021

1976 Nathan Ochsner, Clerk

CRIMINAL COMPLAINT

Case Number: M-21-0129-M

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my

knowledge and belief. On or about January 14, 2021 in Hidalgo County, inthe Southern District of Texas

(Track Statutory Language of Offense)

being then and there an alien who had previously been deported from the United States to Romania in pursuance of law, and thereafter was found near La Joya, Texas, within the Southern District of Texas, the Attorney General of the United States and/or the Secretary of Homeland Security, not theretofore having consented to a reapplication by the defendant for admission into the United States;

in violation of Title 8 United States Code, Section(s) 1326 (Felony)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

Mariana Iordache was encountered by Border Patrol Agents near La Joya, Texas on January 14, 2021. The investigating agent established that the defendant was an undocumented alien and requested record checks. The defendant claims to have illegally entered the United States on January 14, 2021, near Hidalgo, Texas. The defendant was ordered removed from the United States on August 28, 2018. The defendant departed the United States because records show she arrived in Mexico City, Mexico via flight on November 24, 2020. Prior to Deportation/Exclusion the defendant was instructed not to return to the United States without permission from the U.S. Attorney General and/or the Secretary of Homeland Security.

Continued on the attached sheet and made a part of this complaint:

☐ Yes ☒ No

Complaint authorized by AUSA A.Garcia

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

January 16, 2021

4:50 pm

Nadia Medrano

, U.S. Magistrate Judge

Name and Title of Judicial Officer

/s/ Oscar Ortiz

Signature of Complainant

Oscar Ortiz

Border Patrol Agent

Signature of Judicial Officer